

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

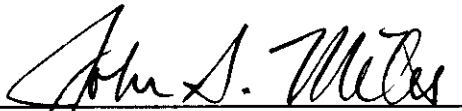
Experimental "Ride-Along" )  
Classification Change for Periodicals )

Docket No. MC2000-1

COX TARGET MEDIA, INC.  
AND COX CONSUMER SAMPLING  
FIFTH INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO POSTAL SERVICE WITNESS ALTAH H. TAUFIQUE (CC/USPS-T1-27-28)  
(November 23, 1999)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, Cox Target Media, Inc. and Cox Consumer Sampling, proceeding jointly herein as the "Cox Companies," hereby submit interrogatories and document production requests. If necessary, please redirect any interrogatory and/or request to a more appropriate Postal Service witness.

Respectfully submitted,

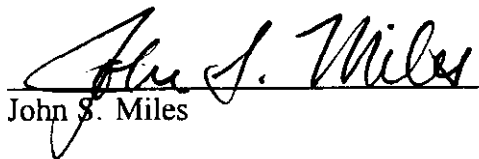


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Counsel for Cox Target Media, Inc.  
and Cox Consumer Sampling

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by hand delivery or mail the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

  
John S. Miles

November 23, 1999

CC/USPS-T1-27.

Does the Postal Service headquarters have any records that show the names and location of firms that are engaged in the business of preparing and sending either solo or co-op mail that contains samples? If so, please provide copies of such records.

CC/USPS-T1-28.

- a. During FY 97 and/or FY 98, what was the volume of Standard (A) mail that contained product samples?
- b. What was the revenue derived from such volume?
- c. Should your answer to preceding parts a and b be to the effect that pertinent volume and revenue data are not readily available from the data which the Postal Service collects on Standard (A) mail, please explain the extent to which the Postal Service has any knowledge, from any source whatever, concerning the volume of product samples that were entered at Standard (A) rates in FY 98, including the source thereof.
- d. As a hypothetical, suppose that the proposed Ride-Along experiment results in an additional 77 million inserts per annum in periodicals, as projected in your testimony. To what extent could the Postal Service's database on Standard (A) mail be used to help ascertain the extent to which some (or all) of the 77 million pieces were diverted from Standard (A)? Please explain fully.
- e. Aside from the proposed survey of advertisers, please explain all other information, data, methodology, etc. that the Postal Service plans to use to determine how much of

the increase in Ride-Along volume is the result of diversion from Standard (A), and how much represents a net increase in volume and revenues.